

**MILMAN LABUDA LAW GROUP PLLC**

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August 15, 2023

**VIA E-MAIL**

Anthony Deo  
c/o Harry R. Thomasson, Esq.  
3280 Sunrise Highway, Box 112  
Wantagh, NY 11793-4024

**Re: Superb Motors Inc., Anthony Deo and Sarah Deo**

Dear Mr. Thomasson:

This office represents Superb Motors Inc. (hereinafter the “Dealership”) and Robert Anthony Urrutia (hereinafter “Urrutia”). We write in furtherance of our demand that all vehicles be returned.

Nissan Motor Acceptance Corporation (“NMAC”) seeks access to audit all vehicles on its line and has requested daily access to all said vehicles.

Similarly, Next Gear Capital (“Next Gear”) is requesting that all vehicles on its line be returned to the main lot in Freehold. See copy of email correspondence annexed hereto.

Your failure to comply with the requests of NMAC and Next Gear creates the risk of irreparable harm to the Dealership. We therefore demand you immediately confirm compliance, especially in light of your prior written representations that you are cooperating with the audits by NMAC and Next Gear.

Dated: Lake Success, New York  
August 15, 2023

Regards,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Emanuel Kataev, Esq.

Emanuel Kataev, Esq.  
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*Attorneys for Superb Motors Inc.  
and Robert Anthony Urrutia*

10:06

5G% 

## Team Auto Sales #138909



Childs, Justina (CAI - Pennsylvania)  
To You

9:55 AM



Good morning,

Based on our conversation on Friday 8/11/23, I'm asking that all Next Gear Capital floored inventory be returned to Team Auto Sales at the contracted lot in Freehold, NJ. Please advise when they have been returned.

Thank you

**Justina Childs**

Portfolio Manager

Financial Solutions Group

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[Carmel, Indiana 46032](#)

m: [267.838.6215](#) | f: [866.550.9319](#)



Will do, thank you.

That is correct.

Will do.



Reply



Mail



Calendar



Feed



Apps



VIN	LINE	VEHICLE	Stock #
1C4PJMAK9CW133196	NG	2012 Jeep Liberty	SU0461A
1GKS2EEFXCR300324	NG	2012 GMC Yukon	SU0831A
WDDJK7DA4JF052861	NG	2018 Mercedes-Benz SL-Class	SU1006
ZAM57YTLXK1316469	NG	2019 Maserati Ghibli	SU1031
ZAM57YTA4K1314330	NG	2019 Maserati Ghibli	SU0912
SALGV2FE5HA328270	NG	2017 Land Rover Range Rover	SU1033
5UXKR0C53J0X91503	NG	2018 BMW X5	SU0993
W1K7X6BB7LA016406	NG	2020 Mercedes-Benz AMG GT	SU1060
SALGS2RE3KA519794	NG	2019 Land Rover Range Rover	SU1065
WP0AF2A74GL082172	NG	2016 Porsche Panamera	SU1148
WBA4E5C59HG188797	NG	2017 BMW 4-Series	SU1025
WBA2H9C36HV986948	NG	2017 BMW 2-Series	SU0882
WAUP4AF5XJA095252	NG	2018 Audi S5	SU1067
SALVP2RXXJH323156	NG	2018 Land Rover Range Rover Evoque	GCA1008A
SALGS2KF4GA246777	NG	2016 LANDROVER RANG R HSE	SU1295
1FTFW1E56JFD20487	NG	2018 FORD F150 LAR	SU1293
SALYL2EX8KA220195	NG	2019 LANDROVER VELAR DYN SE	SU1300
WA1LAAF75KD048863	NG	2019 Audi Q7	SU1219
WA1LAAF77KD012026	NG	2019 Audi Q7	SU1206
WA1B4AFY8L2087049	NG	2020 Audi SQ5	SU1220
WDD7X8KB7KA001866	NG	2019 MERCEDES-B AMG GT 63 S	SU1324
5N1DL0MM6LC528999	NG	2020 INFINITI QX60 PURE	SY1323
ZASPAKBN5L7C91095	NG	2020 ALFA ROMEO STELV TI	SY1319
WBXHT3C57K5L90705	NG	2019 BMW X1 28IX XLN	SY1318
WA1C4AFY9L2045025	NG	2020 Audi SQ5	SU0985
WBXHT3C35J5K24129	NG	2018 BMW X1	SU1177
2T2ZZMCA6HC073637	NG	2017 Lexus RX 350	SU1069
WBAJB1C53KB375171	NG	2019 BMW 5-Series	SU1204

